



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

T2-000326 A

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160
November 1, 2000

Dirk Kempthorne, Governor
C. Stephen Allred, Director

CERTIFIED MAIL # 7099 3220 0001 3891 4848

Donald R. Wind
Sr. Environmental Engineer
P4 Production, LLC
P.O. Box 816
Soda Springs, Idaho 83276-0816

RE: T2-000326, P4 Production, LLC, Soda Springs
Emission Reductions - Scaleroom Scrubber Shutdown
Amended Tier II Operating Permit No. #029-00001

Dear Mr. Wind:

On October 23, 2000, the Idaho Department of Environmental Quality (DEQ) issued a renewed and amended OP No. 042-00001 for the Scaleroom Scrubber Shutdown. Unfortunately, the permit was not issued according to our updated permit numbering system. The correct permit number is 029-00001.

Therefore, enclosed is the amended Tier II OP #029-00001 for the emissions that exist at your facility, which supersedes OP No. #042-00001 issued on October 23, 2000. One-time source tests completed to demonstrate compliance with the permit issued on April 3, 1990 do not need to be repeated for this permit.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Rick Elkins, of the Pocatello Regional Office, at (208) 236-6160.

Sincerely,

Mark Dietrich
Acting Regional Administrator
Pocatello Regional Office

MD/ZQK/bm 2055.6004 J:\XFER\AIR_PERM\PROIT2\P4\T2000326.PL

Enclosure

cc: DEQ State Office *DE*
Pocatello Regional Office
L. Kral, EPA - Region 10

State of Idaho
Department of Environmental Quality

AIR POLLUTION OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER

0 2 9 - 0 0 0 0 1

AQCR

0 6 1

CLASS

A 1

SIC

2 8 1 9

ZONE

1 2

UTM COORDINATE (km)

4 5 2 . 0 , 4 7 2 6 . 0

1. PERMITTEE

P4 Production, LLC

2. PROJECT

Emission Reduction - Scaleroom Scrubber Shutdown

3. MAILING ADDRESS

PO Box 816

TELEPHONE #

(208) 547-4300

COUNTY

Caribou

4. CITY

Soda Springs

STATE

Idaho

ZIP CODE

83276

5. PERSON TO CONTACT

Beth Elroy

TITLE

Sr. Environmental Engineer

6. EXACT PLANT LOCATION

2 miles North of Soda Springs, Idaho on Highway 34

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

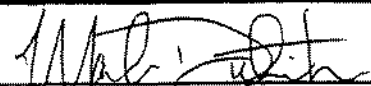
Elemental Phosphorus Production

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND THE IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 58.01.01.200 OF THE *RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO*.

DISCLAIMER: This document may serve as a Preliminary Inspection Finding Form for use by Department personnel in communicating your compliance status upon inspection. It does not constitute a final determination of compliance status with the Idaho Code or any rules promulgated, permits issued, or consent or judicial orders entered into pursuant to the law. The Idaho Department of Environmental Quality reserves the right to supplement this document with additional compliance determinations, and amend, change, or otherwise modify any compliance determination stated in this document. This document in no way restricts the state of Idaho, Department of Environmental Quality from taking any action available under law to address past, present, or future violations of the laws administered by the agency.



REGIONAL ADMINISTRATOR

POCATELLO REGIONAL OFFICE

DEPARTMENT OF ENVIRONMENTAL QUALITY

ISSUED DATE October 23, 2000

EXPIRATION DATE October 23, 2005

Source: A. Undried Quartzite Handling to Screening and Storage

FOR DEQ USE ONLY

[illegible]

emission test or the allowable hourly emission rate (if actual us not available) by the actual hours of operation per year.

- 2.2.2 Visible emissions shall not exceed 20 percent opacity for more than 3 minutes aggregate in any 60 minute period, as required in IDAPA 58.01.01.625, and as determined using the Department's "Procedures Manual."

2.3 Coke and Quartzite Dryer Scrubber Stack

- 2.3.1 Particulate emissions shall not exceed the emission limit set in IDAPA 58.01.01.702 or 29.39 pounds per hour, whichever is more restrictive, as determined by a U.S. EPA Reference Method 5, or approved alternative, emissions test. Annual particulate emissions shall not exceed 126.4 tons per year, as determined by multiplying the actual emission rate measured by a U.S. EPA Reference Method 5, or approved alternative, emissions test or the allowable hourly emission rate (if actual is not available) by the actual hours of operation per year.

- 2.3.2 Visible emissions shall not exceed 20 percent opacity for more than 3 minutes aggregate in any 60 minute period, as required in IDAPA 58.01.01.625, and as determined using the Department's "Procedures Manual."

2.4 Nodule Crushing and Screening Scrubber Stack

- 2.4.1 Particulate emissions shall not exceed the emission limit set in IDAPA 58.01.01.702 or 36.86 pounds per hour, whichever is more restrictive, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate emissions shall not exceed 158.5 tons per year, as determined by multiplying the actual emission rate measured by a U.S. EPA Reference Method 5, or approved alternative, emission test or the allowable hourly emission rate (if actual is not available) by the actual hours of operation per year.

- 2.4.2 Visible emissions shall not exceed 20 percent opacity for more than 3 minutes in any 60 minute period, as required in IDAPA 58.01.01.625, and as determined using the Department's "Procedures Manual."

2.5 Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

Source: A. Undried Quartzite Handling to Screening and Storage

FOR DEQ USE ONLY

[illegible]

3. OPERATING REQUIREMENTS

3.1 Control Equipment

All control equipment controlling emissions from this process shall be operated at all times that quartzite is handled within this process.

4. MONITORING REQUIREMENTS

4.1 Process Weight Rates

The permittee shall install and operate equipment to measure or develop methods to determine the pounds per hour and tons per year of quartzite handled throughout this process.

4.2 Control Equipment

4.2.1 The permittee shall install, operate, calibrate, and maintain instrumentation to accurately measure and indicate the pressure drop across each baghouse and scrubber controlling emissions from this process, and instrumentation to accurately measure and indicate the water flow rate to each scrubber controlling emissions from this process.

4.2.2 Maintenance shall be performed to each baghouse which has visible emissions exceeding 5 percent opacity and to each scrubber which has visible emissions exceeding 15 percent opacity. A measured opacity of 20 percent or less will not constitute a violation of this permit.

4.3 Fugitive Emissions

The permittee shall monitor and record the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions. The records shall be made available to Department representatives upon request.

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

Permittee: P4 Production, LLC
Project: Tier II Operating Permit
Location: Soda Springs, ID

PERMIT NUMBER

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Source: B. Phosphate Ore Nodules, Coke, and Quartzite Proportioning and Handling to the Furnace Stocking Area

FOR DEQ USE ONLY

IN	OUT	PEND	UNK
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1. EQUIPMENT LISTING

This permit pertains to:

- 1.1 Nodule (middle) scaleroom bins 1, 2, 3, 4, 5, and 6;
- 1.2 Nodule (middle) weigh bins 1, 2, 3, 4, 5, and 6;
- 1.3 Quartzite (north) scaleroom bin 7;
- 1.4 Quartzite (north) weigh bin 7;
- 1.5 Coke (south) scaleroom bins 8, 9, 10, and 11;
- 1.6 Coke (south) weigh bins 8, 9, 10, and 11;
- 1.7 Conveyor belt 416;
- 1.8 Scaleroom baghouse, with stack 60 feet high and 3.2 feet diameter
- 1.9 Rotary distributor 421;
- 1.10 Conveyor belt 417
- 1.11 Rotary stock distributor 672;
- 1.12 Conveyor belt 713;
- 1.13 Conveyor belt 714
- 1.14 6 - Furnace 7 stock bins
- 1.15 Furnace 7 CO baghouse, with stack 148 feet high and 1.2 feet diameter
- 1.16 Conveyor belt 418;
- 1.17 Furnace 8 stock diverter;
- 1.18 Conveyor belt 12W;
- 1.19 Conveyor belt 12E;
- 1.20 12 - Furnace 8 Stock bins
- 1.21 Furnace 8 CO baghouse, with stack 155 feet high and 1.5 feet diameter;
- 1.22 Conveyor belt 419;
- 1.23 Furnace 9 Stock diverter
- 1.24 Conveyor belt 420W;
- 1.25 Conveyor belt 420E;
- 1.26 12 - Furnace 9 stock bins;
- 1.27 Furnace 9 CO baghouse, with stack 176 feet high and 1.5 feet diameter;
- 1.28 Furnace stocking system baghouse, with stack 80 feet high and 2.5 feet diameter;
- 1.29 Furnace stocking system baghouse dust container; and
- 1.30 Dust vacuum truck.

2. EMISSIONS LIMITS

2.1 Scaleroom (Quartzite Handling) Baghouse Stack

- 2.1.1 Particulate emissions shall not exceed 2.00 pounds per hour, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate emissions shall not exceed 8.6 tons per year, as determined by multiplying the actual emission rate measured by a U.S. EPA Reference Method 5, or approved alternative,

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

ZOK:bm T2000326 PMT

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Source: B. Phosphate Ore Nodules, Coke, and Quartzite Proportioning and Handling to the Furnace Stocking Area

FOR DEQ USE ONLY

	IN	OUT	PEND	UNK

emission test or the allowable hourly emission rate (if actual is not available) by the actual hours of operation per year.

- 2.4.2 Visible emissions shall not exceed 20 percent opacity for more than 3 minutes aggregate in any 60 minute period, as required in 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*), and as determined using the Department's "Procedures Manual."

2.5 Furnace Stocking System Baghouse Stack

- 2.5.1 Particulate emissions shall not exceed the emissions limit set in IDAPA 58.01.01.702 or 17.63 pounds per hour, whichever is more restrictive, as determined by a U.S. EPA Reference Method 5, or approved alternative, emission test. Annual particulate emissions shall not exceed 77.2 tons per year, as determined by multiplying the actual emission rate measured by a U.S. EPA Reference Method 5, or approved alternative, emissions test or the allowable hourly emission rate (if actual is not available) by the actual hours of operation per year.

- 2.5.2 Visible emissions shall not exceed 20 percent opacity for more than 3 minutes aggregate in any 60 minute period, as required in IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*), and as determined using the Department's "Procedures Manual."

2.6 Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

3. OPERATING REQUIREMENTS

3.1 Control Equipment

All control equipment controlling emissions from this process shall be operated at all times that material is handled within this process.

- 3.2 The production rate shall be determined during the tests required in Section 4 below. The maximum production rate shall not exceed 105 percent of the rate achieved during the tests until the following conditions are met:

- 3.2.1 Prior written approval by the Department is received.
- 3.2.2 An emission test is performed at the requested increased production rate and the test demonstrates compliance with the *Rules for the Control of Air Pollution in Idaho*.

Inspection Comments:

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

Permittee: P4 Production, LLC
Project: Tier II Operating Permit
Location: Soda Springs, ID

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FOR DEQ USE ONLY

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The permittee shall submit to the Department all emission test data, visible emission observation data recorded during the test, the process weight rate recorded during the test, and the average baghouse pressure drop recorded during the test within 30 days after the emission test.

ISSUED DATE:	October 23, 2000
EXPIRATION DATE:	October 23, 2005

TIER II OPERATING PERMIT GENERAL PROVISIONS

IN	OUT	PEND	UNK
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Trial	Control (n=10)	MCI (n=10)	AD (n=10)
1	95	85	75
2	95	85	75
3	95	80	70
4	95	75	65
5	95	75	65

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1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466
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- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures to be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 16.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.

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tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by DEQ, which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

Inspection Comments:

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